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**From:** Labiosa, Rochelle  
**To:** Carlin, Jayne  
**CC:** Wu, Jennifer  
**Sent:** 4/24/2014 1:39:59 PM  
**Subject:** FW: FW: overarching comments on ODEQ's nutrient management program document  
**Attachments:** DRAFTFormattedNutrientProgram2013\_RL.docx

Hi Jayne and Jenny,

A long time ago (January) ODEQ sent a summary of their nutrient program to us for review. I reviewed (my comments on the document are attached), and I had asked Christine to review and/or find the right people to review it. Unfortunately, she has not had time for review. Dru gave me some comments – and I discussed this with her yesterday, and CZARA came up so we thought you might want to take a peek and/or check what I have said vis a vis what we are saying on CZARA. Unfortunately, Aron has asked for the comments this week, so this would mean taking a look today if possible.

Thanks so much, Rochelle

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**From:** Labiosa, Rochelle  
**Sent:** Wednesday, April 23, 2014 2:57 PM  
**To:** Keenan, Dru  
**Subject:** FW: FW: overarching comments on ODEQ's nutrient management program document

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**From:** Labiosa, Rochelle  
**Sent:** Friday, April 11, 2014 11:17 AM  
**To:** Keenan, Dru  
**Subject:** FW: overarching comments on ODEQ's nutrient management program document

Hi Dru,

Christine was going to review these comments before I sent but she has not had a chance. Do you mind taking a quick look? I tried to reflect the comments you gave me verbally. I am planning to send when I return to the office after spring break.

Thanks, Rochelle

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**From:** Labiosa, Rochelle  
**Sent:** Wednesday, March 26, 2014 3:08 PM  
**To:** Psyk, Christine  
**Subject:** IDEQ talk from nutrients roadshow and FW: overarching comments on ODEQ's nutrient management program document

Hi Christine,

Here are the two documents you requested – I also have all presentations from the roadshow on the G drive in case you are missing any presentations:

G:\Baker\Water and Watersheds\Water Quality Standards\nutrients\2014\_nutrients\_roadshow

Just let me know if anything else would be helpful for your update to HQ.

Rochelle

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**From:** Labiosa, Rochelle  
**Sent:** Monday, March 10, 2014 12:11 PM  
**To:** Psyk, Christine  
**Subject:** overarching comments on ODEQ's nutrient management program document

Hi Christine,

I am attaching my comments (reflecting some from Dru) on ODEQ's nutrient management program document.

Overall, it was encouraging to see that ODEQ could address each of EPA's seven steps. However, the program could roughly be for any pollutant –very few actions were nutrient-specific.

They lack citations for a lot of the upfront comments about the status of nutrient pollution in Oregon surface waters, many of which are oversimplifications. They then speak to some identified problem areas but do not cite to data or studies. In all cases, there should be citations and/or plots. More maps would also be helpful to illustrate the work going on.

The watershed prioritization piece could be better fleshed out – they mention that their process for TMDL prioritization is ad-hoc, but they could speak more to the basin water quality assessments that they conduct, their monitoring and evaluation methodologies, and how they assess impairment in a more cohesive way (provide more detail). They are also missing the methods on translating from the criteria that they link to nutrients (response variables) to setting numeric nutrient targets, methods, challenges and utility of their methodology. For proactive/protectiveness, they could also speak more to antidegradation and how that plays a role in their work.

A more comprehensive approach following the CWA programs would be better, ie, first talk about the designated uses they are protecting from nutrient pollution; the criteria they have on the books; the monitoring and assessment methodology; how antideg works for nutrient impacts; if impaired, their approach to TMDLs; and then back to how they assess improvement and reduce impairment (and maybe some case studies that showed improvement with their current approach). Dru suggested that they organize by Part 1 – Prevention and Monitoring, and Part 2: Response actions.

Thanks and let me know what you think – I mentioned to ODEQ at the roadshow that we would get back to them shortly with our comments.

Rochelle

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